

Continuation of Application for Search Warrant

1. Your Affiant is a U. S. Postal Inspector with the U. S. Postal Inspection Service (USPIS) and has been so employed since May 2012. I am currently assigned to work a miscellaneous assignment to include Prohibited Mailings - Narcotics investigations. Prior to that, I was an officer with Franklin Police Department in Franklin, IN, for 4 and ½ years. I have received advanced training by the USPIS in the investigation of controlled substances or proceeds/payments being transported through the United States. The Grand Rapids Domicile Multi-Functional Team has intercepted numerous parcels which were found to contain narcotics or proceeds of narcotics trafficking and other criminal activity.

2. This affidavit is made in support of an application for a search warrant on a Priority Mail Parcel with United States Postal Service (USPS) Tracking number 9505 5213 6322 4042 0005 00, addressed to Joe Ramirez, 8759 S. Scottsdle Rd, Berrian Spring, MI, 49103, with a return address of Jeanette Martinez, 1206 S 19 ½ St, McAllen, TX, 78501. Further this parcel weighs approximately 28 pounds 5.2 ounces, measures approximately 16" X 23" X 18", bears \$57.95 in postage and fees and is a brown cardboard box.

3. From my training and experience, I am aware that Priority Mail service was created as a less expensive choice than Express Mail (overnight) delivery, but designed to provide quicker more reliable service than First Class Mail. When a customer mails an article via Priority Mail, the Postal Service provides 2-3 day delivery service. The Postal Service also offers a tracking service, which allows for tracking of an article, similar to that of Express Mail service.

4. Based on my training and experience regarding Priority Mail operations, I am aware that the majority of Priority Mail mailings are business related. Businesses have found that it is a much less expensive method of mailing than Express Mail, particularly when next day service is not a requirement. I also know that, similar to Express Mail, Priority Mail business mailings tend to be smaller, lighter mailings and average lighter than two pounds. Examples of the types of business mailings conducted via Priority Mail include: books, clothing, pharmaceuticals and video/compact discs.

5. Based on my training and experience regarding the use of Priority Mail for the transportation of controlled substances or the proceeds from the sale of controlled substances, I know these types of mailings usually bear some or all the following characteristics:

- a. The parcels often are heavier than the typical Priority Mail mailings, often weighing more than two pounds.
- b. These Priority Mail parcels often stand out from typical business mailings as they do not bear any advertising on the mailing container/box and are usually addressed from one individual to another.
- c. The article either; (a) was destined for an area known to be a frequent destination point for controlled substances, having been mailed from an area known to be a source area of controlled substances; (b) originated from an area known to be a frequent origination point for the proceeds from the sales of controlled substances, having been mailed to an area known to be a destination area for the proceeds from the sales of controlled substances.

Articles found to bear the characteristics described above are further scrutinized by Postal Inspectors.

6. From my training, personal experience, and the collective experience related to me by other Postal Inspectors in the Prohibited Mailings Team who specialize in investigations relating to the mailings of controlled substances and the proceeds from the sale of controlled substances, I am aware the McAllen, Texas area is a source location for controlled substances, specifically marijuana. As such, controlled substances are frequently transported from the McAllen, Texas area via the United States Mail, and the proceeds from the sale of the controlled substances are frequently returned to the McAllen, Texas area also via the United States Mail.

7. Based on my training and experience, I know that drug traffickers will often use fictitious names or incomplete names and/or addresses in an attempt to conceal their identity from law enforcement. Address verifications are conducted and the return/recipient addresses listed on the articles are often either fictitious, incomplete, or do not exist. In addition to address verifications, the articles are subject to trained narcotic-detecting canine examination.

8. On February 12, 2014, Inspector Michael Williams was contacted by a United States Postal Inspection Service (USPIS) contractor from the McAllen Texas Domicile. This USPIS contractor informed Inspector Williams that a Priority Mail Parcel was located being mailed from McAllen, Texas heading to Berrien Springs, Michigan and was removed from the mail stream for further investigation. Upon a further inspection of the Subject parcel, it displayed several characteristics that indicated that it may contain a quantity of controlled substances.

9. A review of the Subject Parcel revealed it met three (3) of the characteristics described in Paragraph No. 5; including weighing more than two pounds, did not bear any advertising on the mailing container/box, and it was mailed from McAllen, Texas.

10. On February 13, 2014, Postal Inspectors in Grand Rapids, MI discovered per law enforcement databases that the sender's purported name, Jeanette Martinez, was not associated to the listed address of 1206 S. 19 ½ St, McAllen, TX 78501. It was also discovered the recipient's purported name Joe Ramirez, was not associated to listed address 8759 S. Scottsdale Rd, Berrien Spring, MI 49103.

11. Based on my training and experience, I have learned that individuals who mail and receive controlled substances and their proceeds by mail often use a fictitious or incomplete name or address in order to hide their true identity.

12. On February 13, 2014, Inspector Williams met Trooper J. Bozek at the USPIS Office located at 800 Monroe NW, Grand Rapids, MI 49503. Trooper J. Bozek is assigned to the Michigan State Police Hometown Security Team (HST) and is a member of the Michigan State Police. Trooper Bozek brought "Yaro," a narcotics detection K-9, to this office. According to Bozek, "Yaro" is a two year old German Shepherd Police Service Dog certified in narcotics detection. K-9 "Yaro" was trained in narcotics detection by the Michigan State Police Training Academy in Lansing, Michigan. Trooper Bozek and K-9 "Yaro" were trained in narcotics detection as a team with the Michigan State Police Training Academy in May of 2012. K-9 "Yaro" is trained in the odors of marijuana, cocaine, crack cocaine, heroin and methamphetamine. Trooper Bozek and K-9 "Yaro" are required to certify annually in narcotics detection with the Michigan State Police Training Academy and was last certified in October 2013. This certification with the Michigan State Police Training Academy is both current and valid.

Trooper Bozek and K-9 "Yaro" train as a team weekly. K-9 "Yaro" has successfully indicated on the odor of narcotics in excess of 100 times while investigating specific complaints and in training sessions. Trooper Bozek has found K-9 "Yaro" to be reliable.

13. On February 13, 2014, at approximately 12:43 PM, at 800 Monroe NW, Grand Rapids, MI, Inspector Williams arranged a controlled substance detection test by placing the subject parcel with four similar parcels in an area at the USPIS office. Inspector Williams observed Trooper J. Bozek and "Yaro" enter the test area. Inspector Williams observed "Yaro" examine the area and alert only on the Subject Parcel by sitting in front of the parcel. Trooper J. Bozek advised Inspector Williams that this action indicated that narcotics and/or controlled substances were likely contained in the parcel.

14. Based on the above facts, there is probable cause to believe there are controlled substances or proceeds related to the sale of controlled substances contained in the Subject Parcel, in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846, and request authority to search it.